

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

RUSS GODFREY and	)	
NATALIE GODFREY,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.: CIV-19-329-G
	)	
CSAA FIRE & CASUALTY	)	
INSURANCE COMPANY,	)	
a foreign corporation,	)	
	)	
Defendants.	)	

**DEFENDANT’S OBJECTIONS TO PLAINTIFFS’ FINAL EXHIBIT LIST**

The Defendant, pursuant to this Court’s Scheduling Order [Doc No. 15], submits the following Objections to Plaintiffs’ Final Exhibit List in the above case.

1. Defendant intends to file a Motion for Partial Summary Judgment with respect to Plaintiffs’ bad faith and punitive damages claims. If that Motion is granted, it will render moot and/or inadmissible Plaintiffs’ Exhibit Nos. 2-6, and 13 in Plaintiffs’ Final Exhibit List. Accordingly, to that extent, Defendant objects to these Exhibits on grounds of relevance (402, 403) and hearsay (801 *et seq.*).

2. Plaintiffs’ Exhibit Nos. 3, 4, 5, 9, 10, 14, 24, 25, 26, and 27 are vague, overly broad, and have not been produced to date. Accordingly, without having an opportunity to inspect these documents/exhibits, CSAA reserves the right to further object at a later date if/when these documents are produced for inspection. At the present time, however, CSAA also objects on grounds of relevance (402, 403) and hearsay (801 *et seq.*).

3. Plaintiffs' Exhibit Nos. 14, 15, 16, 17, 18, 19, 20, 21, 22, 24, 26, 27, 28, 29, 32, 33, 34, and 35 are descriptions of categories of exhibits that are not properly identified. These documents have not been produced to date. Accordingly, Defendant reserves the right to further object if/when these documents are produced for inspection. As further objection, CSAA objects on the grounds of relevance (402, 403) and hearsay (801 *et seq.*).

Respectfully submitted,

s/ Gerard F. Pignato

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**ATTORNEYS FOR DEFENDANT**

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Steven S. Mansell, Esquire

Mark A. Engel, Esquire

Kenneth G. Cole, Esquire

M. Adam Engel, Esquire

Keith F. Givens, Esquire

MANSELL ENGEL & COLE

s/ Gerard F. Pignato

For the Firm